

JOYCE & JACOBS

ATTORNEYS AT LAW

2300 M STREET, N.W.

EIGHTH FLOOR

WASHINGTON, D.C. 20037

(202) 457-0100

FACSIMILE

(202) 457-0180

MARYLAND OFFICE
CHEVY CHASE METRO BUILDING
TWO WISCONSIN CIRCLE
SEVENTH FLOOR
CHEVY CHASE, MD 20815

February 20, 1990

VIA TELEFAX

Ms. Gloria Watson
Coordination Services
National Association of
Business & Educational Radio
1501 Duke Street
Alexandria, VA 22304

RE: NABER Control Number 893520214

Dear Ms. Watson:

On behalf of RAM Technologies, Inc. ("RAM"), this letter is written in response to your February 13, 1990 "Notice to paging co-channel licensees." RAM is the licensee of Private Carrier Paging facilities, Call Signs WNJN 621, et al., (FCC license authorizations are attached hereto for your convenience) on the 152.48 MHz frequency throughout various locations in Kentucky, Ohio, and West Virginia.

Your letter concerns a coordination request submitted to NABER by "Capital Paging" for the 152.48 MHz frequency at Charleston and Huntington, WV. You have asked co-licensees to provide NABER with "any substantive comments of technical information that would be helpful" to NABER's coordination process.

Attached hereto for your information is a copy of the January 30, 1990 letter from RAM to NABER. The purpose of that letter was to inform NABER that, on the basis of high traffic levels on the 152.48 MHz frequency, it would be extremely difficult to avoid harmful co-channel interference if any additional licensees are coordinated on that frequency. In support of that statement, RAM submitted to NABER a traffic load study indicating that the frequency was then loaded to 91% of its capacity at the busy hour. That traffic study is attached hereto for your consideration.

RAM continues to add new subscribers to its wide-area system at the rate of 400 to 500 per month. This week, RAM will conduct an updated traffic load study which will be forwarded to NABER promptly. It is anticipated that the updated study will show that the 152.48 MHz frequency is now loaded to more than 91% of its capacity at the busy hour. Thus, RAM estimates that by May or June of this year, even without accounting for co-channel licensee growth, the 152.48 MHz frequency will be occupied during the busy hour approximately 95% to 100% of the time.

RAM fully understands the shared nature of PCP frequencies; nevertheless, in light of the high level of usage on the 152.48 MHz frequency, and since there are numerous other PCP channels available in the Huntington/Charleston area, RAM submits that it would not be in the interests of current 152.48 MHz users to

000011

Ms. Gloria Watson
February 20, 1990
Page 2 of 2

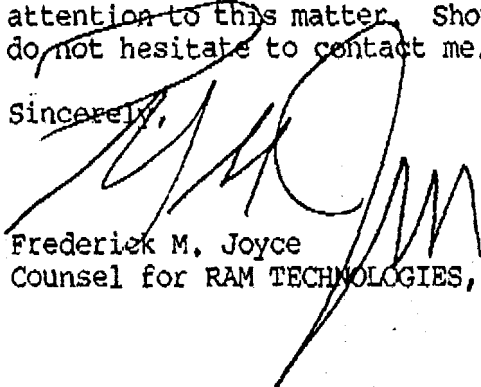
coordinate additional licensees on that frequency.

In addition, because RAM operates a wide-area PCP system, coordination with additional co-channel licensees would be extremely difficult, if not impossible unless the terminals were co-located. RAM cannot accurately assess its ability to coordinate with Capital Paging's proposed operations without knowing Capital Paging's proposed transmitter locations and output power. Before any further action is taken with respect to this pending application, please provide RAM with this technical information necessary to determine the likelihood of co-channel interference.

In short, due to current and projected traffic levels on the 152.48 MHz frequency, the difficulty of coordinating RAM's wide-area system with another co-channel licensee, and the ready availability of many other frequencies for paging service, RAM submits that Capital Paging's application for new PCP facilities should be coordinated on a frequency other than 152.48 MHz. The facts indicate that another carrier could not be authorized on this frequency without causing harmful co-channel interference to incumbent licensees, thereby degrading the high quality service now provided to over four thousand paging units.

Thank you very much for your attention to this matter. Should you have any questions in this regard, please do not hesitate to contact me.

Sincerely,



Frederick M. Joyce
Counsel for RAM TECHNOLOGIES, Inc.

FMJ:est
enclosure

000012

February 21, 1990

Ms. Gloria Watson
Coordination Services
National Association of
Business & Educational Radio
1501 Duke Street
Alexandria, VA 22304

RE: Capital Paging application

Dear Ms. Watson:

I am writing to you in response to your February 13, 1990 letter concerning the application of Capital Paging for a 152.48 MHz paging station in Charleston, Huntington, WV. My company, T&T Communications, Inc., is licensed under several call signs to provide paging service throughout a large portion of West Virginia, including Parkersburg and other locations just north of Capital's proposed facilities. Within the next few months, my company plans on extending its service area South and Southwest so that eventually our customers will be able to obtain service throughout a wide, multi-state area.

As of today, T&T Communications provides service to approximately 300 to 400 users. We have been signing up new subscribers at the rate of roughly 40 to 50 per month. Once we begin marketing our wide-area service, we expect that our new activations will increase substantially.

I am concerned that if NABER licenses any more carriers on the 152.48 frequency in the Charleston, Huntington area, it may be difficult for my company to provide wide-area paging service to existing and future subscribers on an interference-free basis. I would certainly be willing to talk to Capital Paging about how they propose to engineer their system so as to avoid co-channel interference; however, since there are other paging channels available in this area, I believe the safer route would be to license Capital Paging on one of those clear channels, rather than risk causing harmful interference to my subscribers.

Thank you for taking our concerns under consideration. If I can be of any further help, or if you have any questions, please do not hesitate to call me.

Yours truly,

Donnie Tucker, Pres.

000013

JOYCE & JACOBS

ATTORNEYS AT LAW

2300 M STREET, N.W.

EIGHTH FLOOR

WASHINGTON, D.C. 20037

(202) 457-0100

MARYLAND OFFICE
CHEVY CHASE METRO BUILDING
TWO WISCONSIN CIRCLE
SEVENTH FLOOR
CHEVY CHASE, MD 20815

FACSIMILE

(202) 457-0186

February 23, 1990

VIA TELEFAX

Ms. Gloria Watson
Coordination Services
National Association of
Business & Educational Radio
1501 Duke Street
Alexandria, VA 22304

RE: NABER Control Number 893520214

Dear Ms. Watson:

On behalf of RAM Technologies, Inc. ("RAM"), as referenced in its February 20, 1990 letter to you, enclosed for your information you will please find RAM's updated traffic load study for its 152.48 MHz private carrier paging ("PCP") operations. This study, conducted February 19, 1990, shows that the 152.48 MHz frequency was occupied at more than 93% of its capacity during the busy hour (the utilization figures remain high throughout the workday). RAM's January 25, 1990 study showed a 91% load level during the busy hour.

RAM's projection that the frequency will be approaching 100% saturation within the next two to three months, is thus verified by these recent figures. In the interests of avoiding harmful interference to existing and interested subscribers, RAM once again respectfully requests that no new carriers be coordinated on the 152.48 MHz frequency in the subject service areas.

Thank you very much for your attention to this matter. Should you have any questions in this regard, please do not hesitate to contact me.

Sincerely,

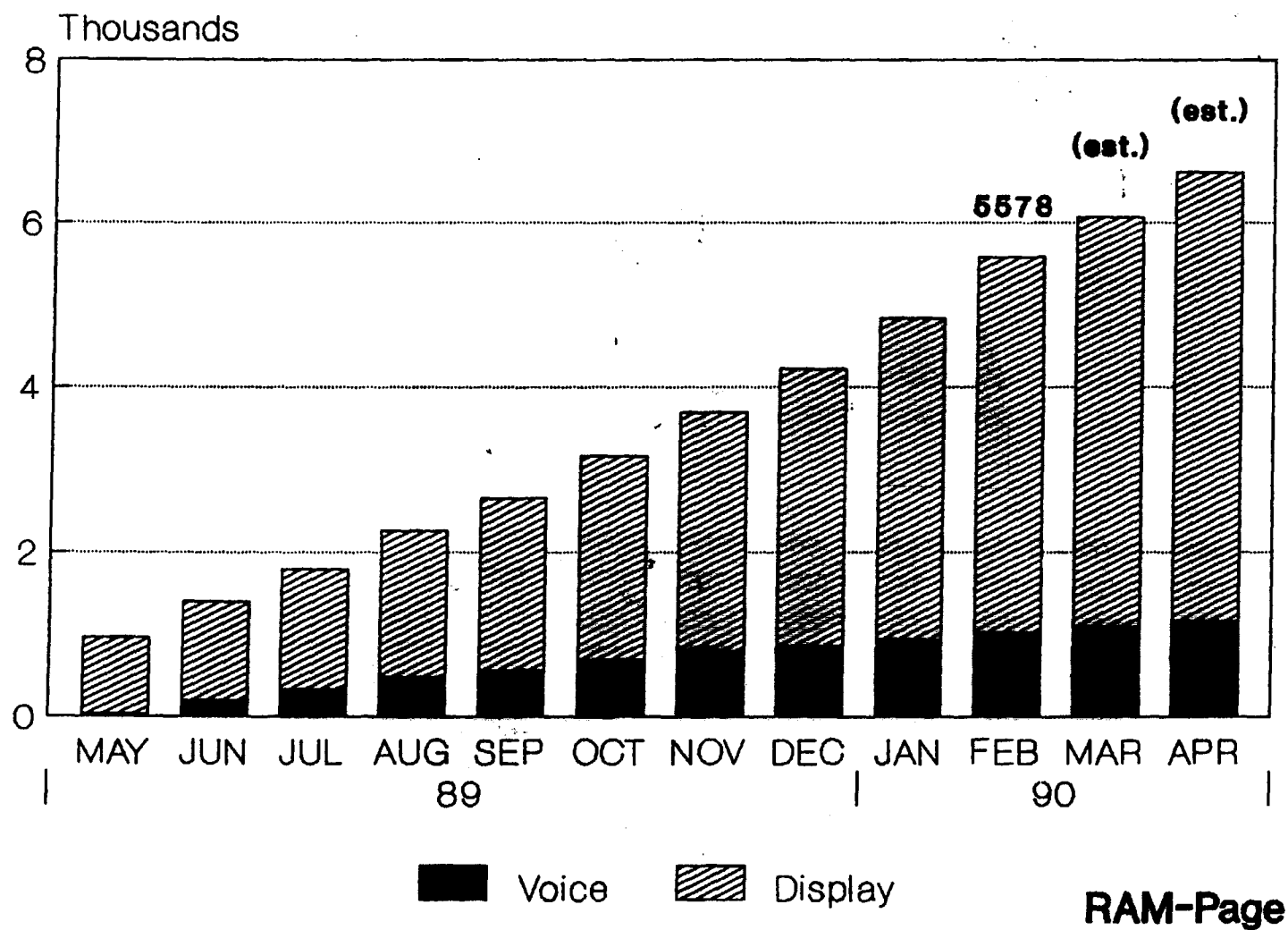

Frederick M. Joyce
Counsel for RAM TECHNOLOGIES, Inc.

FMJ:est
enclosure
cc: Robert A. Moyer, Jr., Pres.

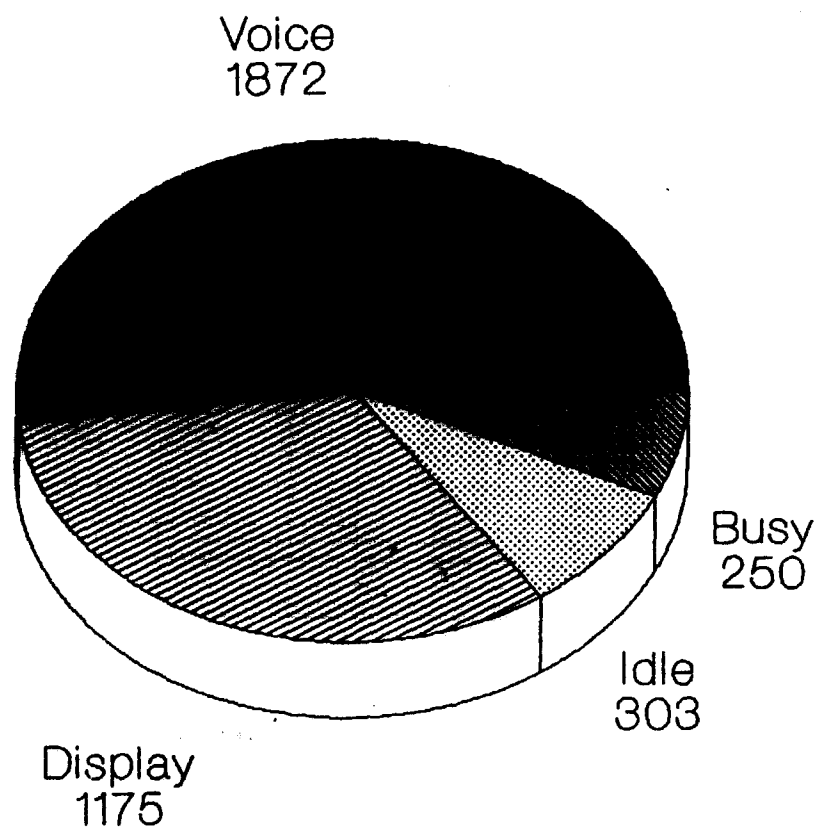
000014

Pagers on System

Shown By Type



Channel Usage by Pager Type

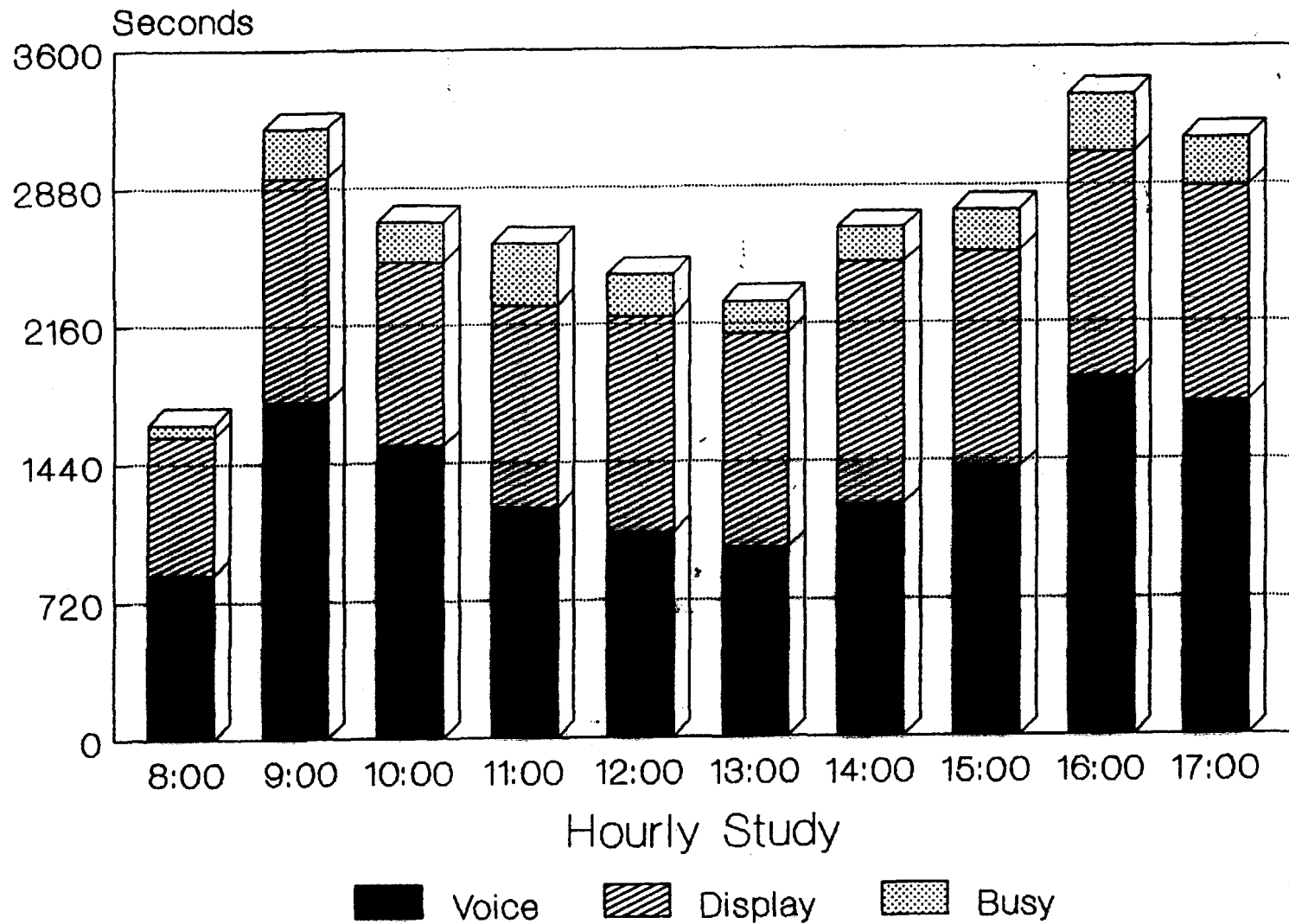


RAM-Page

Busy Hour: 15:00 - 16:00 02-19-90

Traffic Study

000017



HAN-PAKE Daily Traffic Study
02/19/90

| Hour | Voice | Usage Display | Busy | Total Usage | Voice | Utilization Display | Busy | Total Channel Utilization |
|-----------|-------|------------------|------|----------------|--------|------------------------|-------|------------------------------|
| 8:00 | 860 | 723 | 65 | 1648 | 23.89% | 20.08% | 1.81% | 45.78% |
| 9:00 | 1762 | 1172 | 258 | 3192 | 48.94% | 32.56% | 7.17% | 88.67% |
| 10:00 | 1531 | 956 | 213 | 2700 | 42.53% | 26.56% | 5.92% | 75.00% |
| 11:00 | 1202 | 1057 | 325 | 2584 | 33.39% | 29.36% | 9.03% | 71.78% |
| 12:00 | 1074 | 1129 | 218 | 2421 | 29.83% | 31.36% | 6.06% | 67.25% |
| 13:00 | 988 | 1123 | 163 | 2274 | 27.44% | 31.19% | 4.53% | 63.17% |
| 14:00 | 1210 | 1265 | 184 | 2659 | 33.61% | 35.14% | 5.11% | 73.86% |
| 15:00 | 1399 | 1132 | 217 | 2748 | 38.86% | 31.44% | 6.03% | 76.33% |
| *** 16:00 | 1872 | 1175 | 303 | 3350 | 52.00% | 32.64% | 8.42% | 93.06% *** |
| 17:00 | 1741 | 1128 | 254 | 3123 | 48.36% | 31.33% | 7.06% | 86.75% |

JOYCE & JACOBS

ATTORNEYS AT LAW

2300 M STREET, N.W.

EIGHTH FLOOR

WASHINGTON, D.C. 20037

(202) 457-0100

APR 09 1990

FACSIMILE

(202) 457-0186

MARYLAND OFFICE
CHEVY CHASE METRO BUILDING
TWO WISCONSIN CIRCLE
SEVENTH FLOOR
CHEVY CHASE, MD 20815

April 3, 1990

VIA TELEFAX

Ms. Gloria Watson
Coordination Services
National Association of
Business & Educational Radio
1501 Duke Street
Alexandria, VA 22304

**RE: NABER Control Number 893520214
Capitol Radiotelephone Application**

Dear Ms. Watson:

RAM Technologies, Inc. ("RAM"), through its attorneys, hereby requests copies of all the file materials pertaining to the above-referenced application for Private Carrier Paging facilities. As you know, RAM is a co-licensee on the 152.48 MHz frequency. RAM had submitted to NABER a traffic load study, and copies of Declarations which stated that the referenced applicant intended to cause harmful interference to RAM's PCP system. It is RAM's understanding that, despite this evidence, NABER has recommended to the FCC that the subject application be granted.

RAM recently submitted to the FCC a Petition to Deny the referenced application, based in part on the allegations which it brought to NABER's attention. RAM respectfully requests a copy of the Capitol application, and of any and all related materials in NABER's Capitol file, so that it may bring all the pertinent facts to the FCC's attention.

Since time is of the essence with respect to RAM's pending Petition, please notify the undersigned as soon as possible when the files will be available. RAM will reimburse NABER for all photocopying and postage/handling charges attendant to this request.

Thank you for your attention to this matter. If you have any questions, please do not hesitate to contact the undersigned.

Sincerely,


Frederick M. Joyce
Counsel for RAM Technologies, Inc.

FMJ:est

000019

AUG 31 1990

JOYCE & JACOBS

ATTORNEYS AT LAW

2300 M STREET, N.W.

EIGHTH FLOOR

WASHINGTON, D.C. 20037

(202) 457-0100

MARYLAND OFFICE
CHEVY CHASE METRO BUILDING
TWO WISCONSIN CIRCLE
SEVENTH FLOOR
CHEVY CHASE, MD 20815

FACSIMILE
(202) 457-0186

August 28, 1990

VIA HAND DELIVERY

David Whalin, Esq.
Congressman Carl Perkins
1004 Longworth House Office Bldg.
Washington, DC 20515

RE: RAM Technologies, Inc.

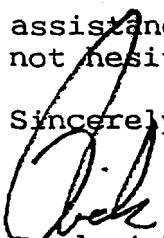
Dear Dave:

Pursuant to our telephone discussion of last week, enclosed you will please find the final version of RAM Technologies' "Petition for Reconsideration" and "Motion for Stay," and a draft letter to the Private Radio Bureau for the Congressman's consideration. Whatever assistance you can render would be most appreciated by all private carrier paging users on the 152.480 frequency.

Since the radio frequency in question is a shared, not an exclusive frequency, the ex parte contact rules of the FCC probably do not apply to this proceeding (in other words, RAM and Capitol's interests are not "mutually exclusive"). Nevertheless, out of professional courtesy, I would appreciate it if you would copy opposing counsel with any correspondence sent to the FCC. Kenneth Hardman's address is on the petition's service list.

Again, thank you for your assistance, Dave. Of course, if you have any questions, please do not hesitate to call me.

Sincerely,


Frederick M. Joyce

FMJ:est
enclos.
cc: Robert A. Moyer, Jr.

000020



National Association of Business and Educational Radio

1501 Duke Street
Alexandria, VA 22314
703-739-0300
1-800-759-0300

N A B E R



1985-1990

September 19, 1990

Ram Page/Ram Technologies Inc
Robert Moyer Jr
2025 13th St - P O Box 1760
Ashland, KY 41105-1760

Dear Mr. Moyer:

NABER has recently received a letter of complaint concerning the manner in which your paging service has been operating it's one way radio system on frequency 152.480MHz. Specifically Communication Service Inc has stated that operations by Ram-Page has been interrupting their transmitters there by making one way paging communication extremely difficult. Communication Service also stated that in downtown Charleston the signal from your Charleston transmitter overrides there pages in progress rendering there system useless.

NABER advise all paging licensees to take proper precautions in order to co-exist in this area. This included but is not limited to monitoring the frequency, you can set your transmitters to detect a busy channel and hold your pages until the channel is clear you may want to look into coordinating tone codes. Monitoring may be done manually or automatic.

Communication Service has stated that they monitor the frequency on a continuous basis and most of the time they cannot even access there terminal due to the receiver at there transmitter site hold the control line open because of the transmission for one area removed are being transmitted in Charleston.

If both user were to operate under the parameters of their license, NABER believes that both users should be able to co-exist. In order to solve this co-channel sharing problem, NABER advises that you contact Calvin R Basham at (304) 744-8613 to discuss any other remedies.

If this situation continues it could affect future applications from being process if this is not cleared up. NABER will forward this complaint to the FCC for further evaluation. Please contact NABER if we can be of any assistance in bring about a prompt and equitable solution.

Sincerely,

Gloria Perrin
Gloria Perrin

Frequency Coordinator

000021



October 2, 1990

Ms. Gloria Perrin
NABER/LAO
1501 Duke Street
Suite 200
Alexandria, VA 22314

Dear Gloria:

We have received your letter of September 19th concerning our paging operation on frequency 152.48 Mhz in Charleston, West Virginia and the allegations made by Mr. Basham.

I have previously discussed these allegations at length with Mr. Jerry Franz of the FCC - Compliance Division. I assured him and I assure you that Mr. Basham's allegations are groundless and without merit. Our busy out monitor system for the Charleston, West Virginia area has been checked and is in perfect working order.

Furthermore, we have had continuing problems with Mr. Basham placing illegal transmissions on his 152.48 Mhz system in Charleston, West Virginia. Specifically on August 10, 1990: we noticed our paging system backing up pages to the point where customers were calling to say they were getting busy signals. We checked immediately and found that the Charleston, West Virginia busy out monitor system was receiving a constant stream of voice pages and holding our transmitters off the air. We determined after some monitoring that the Charleston Area Medical Center paging system was being broadcast on 152.48 and simultaneously on their own frequency 163.25 Mhz. I called CAMC and talked to Ms. Marge Jones and she told me she was unaware that there was a problem. She said that Mr. Calvin Basham provided service on their system and that their transmitter was located at Mr. Basham's tower site. In the meantime we heard Mr. Basham's voice on the frequency doing some test counts.

DIVISIONS INCLUDING:

• LONG DISTANCE
TELEPHONE SAVERS

• RADIO ENGINEERING
& MAINTENANCE CO.

• RAM-PAGE

• TELEGLOBAL
COMMUNICATIONS

• HUNTINGTON TELEPHONE
ANSWERING SERVICE, INC.

2025 13TH STREET ■ P. O. BOX 1760 ■ ASHLAND, KENTUCKY 41105-1760
1-606-324-1RAM 1-304-343-1RAM 1-304-522-1RAM

000022

Ms. Gloria Perrin
October 2, 1990
Page 2

I called Mr. Basham to ask him if he knew what was going on and he said he was putting some of CAMC'S pagers on his frequency. I said that this was fine but that he couldn't patch their audio over to his 152.48 Mhz transmitter. He said, "Why not", and indicated to me that he had been doing just that and that there was nothing wrong with it. I told him it was not legal to do this.

This stopped and then started again later in the day. I called him again and we had an argument. Again, this stopped.

I talked to Rick Joyce, our attorney and he told me to call Paul Makowsky FCC - Engineer in charge in Detroit. I had a long talk with him but we decided he had no jurisdiction since the transmitter was in West Virginia (we are headquartered in Kentucky). He gave me Jerry Franz name, but since the problem stopped, I did not call him.

Then on August 24, 1990 exactly two weeks later we had a similar problem but when we investigated we found a carrier with no audio being transmitted on 152.48 Mhz by someone in the Charleston, West Virginia area to be backing up our system. My service manager, Forrest Collier called Mr. Basham and he said he heard it on his monitor but didn't know who was transmitting it. It stopped approximately five minutes later.

Gloria, we feel that Mr. Basham is harassing us because he is jealous. After all he had his transmitter on the air before us and has never had over 100 pagers on it while we presently have approximately 2,700 pagers on ours. Our system is extremely busy but the way our system is built it does not preclude him from operating his system.

We would be glad to work with Mr. Basham to help him if his system has problems, but he has shown an unwillingness to work with us in any way. We have no problem with any of the carriers on 152.480 anywhere else and in fact we have joined systems via a TNPP Network with two other paging companies in West Virginia. Those companies are: T & T Communications/West Virginia Paging and Telpage Systems.

RAM Technologies, Inc.

DIVISIONS INCLUDING:

• LONG DISTANCE
TELEPHONE SAVERS

• RADIO ENGINEERING
& MAINTENANCE CO.

• RAM-PAGE

• TELEGLOBAL
COMMUNICATIONS

• HUNTINGTON TELEPHONE
ANSWERING SERVICE, INC.

2025 13TH STREET ■ P. O. BOX 1760 ■ ASHLAND, KENTUCKY 41105-1760
1-606-324-1RAM 1-304-343-1RAM 1-304-522-1RAM

000023

Ms. Gloria Perrin
October 2, 1990
Page 3

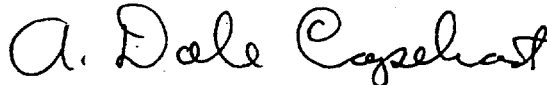
Gloria, to show good faith we would like to offer to recrystal Mr. Basham's transmitter and any pagers he has in stock if he would consider moving to the equal but uncongested 157.74 Mhz frequency. This would be a good answer to the problem for both of us. We are writing a letter to Mr. Basham to this effect (copy enclosed) and we are also offering to let him use our system for his customers at no cost to him.

Also, Gloria, I would like to address Mr. Basham's allegations that we are allowing ineligible to use our PCP System. We are simply not doing that. We have even gone to the trouble of obtaining a waiver to serve some normally ineligible customers which have requested our service.

Attached is a copy of our standard contract. Please read the paragraph circled. If we discover that Mr. Basham's daughter intentionally perjured herself by signing one of these contracts when she was in fact ineligible to use our service, then we will turn that matter over to our attorneys for further action.

We are truly making every effort to abide by all the FCC rules in operating our system. Please keep me advised as to the status of this situation and call me if you should need further information.

Sincerely,



A. Dale Capehart
Sales Manager

ADC/tlw

Attachment

RAM Technologies, Inc.

DIVISIONS INCLUDING:

• LONG-DISTANCE
TELEPHONE SAVERS

• RADIO ENGINEERING
& MAINTENANCE CO.

• RAM-PAGE

• TELEGLOBAL
COMMUNICATIONS

• HUNTINGTON TELEPHONE
ANSWERING SERVICE, INC.

2025 13TH STREET ■ P. O. BOX 1760 ■ ASHLAND, KENTUCKY 41105-1760
1-606-324-1RAM 1-304-343-1RAM 1-304-522-1RAM

000024



October 2, 1990

Mr. Calvin Basham
Communication Service, Inc.
4009 W. Washington Street
Charleston, WV 25313

Dear Mr. Basham:

We are truly mystified at why you are having a problem with your PCP system on 152.48 Mhz in Charleston, West Virginia. Our busy out monitor is in perfect working order. We have no quarrel with you nor do we want any trouble. To this end we are offering to let your customers use our system. We will furnish you cap codes and phone numbers for all of your present eligible users. Also, we would be glad to pay for the cost of changing your transmitter, pagers, and license to the equally desirable but less congested frequency of 157.74 Mhz.

Please advise us how you wish to proceed.

Sincerely,

A. Dale Capehart

A. Dale Capehart
Sales Manager

ADC/tlw

DIVISIONS INCLUDING:

• LONG DISTANCE
TELEPHONE SAVERS

• RADIO ENGINEERING
& MAINTENANCE CO.

• RAM-PAGE

• TELEGLOBAL
COMMUNICATIONS

• HUNTINGTON TELEPHONE
ANSWERING SERVICE, INC.

2025-13TH STREET ■ P. O. BOX 1760 ■ ASHLAND, KENTUCKY 41105-1760
1-606-324-1RAM 1-304-343-1RAM 1-304-522-1RAM

000025

EXHIBIT CAP-19

UNITED STATES GOVERNMENT

M E M O R A N D U M

PRB Case # 90068

ORIGINAL

DATE: July 19, 1991

REPLY TO

ATTN OF: Chief, Compliance Branch, PRB

SUBJECT: RAM Technologies, Inc./Capitol Radiotelephone, Inc. 152.480 MHz
Request for inspection.

TO: Chief, Investigations and Inspections Branch, FOB

Mr. Dick Shiben received a complaint from RAM Technologies today alleging that Capitol Radiotelephone is maliciously interfering with its private carrier paging system on 152.480 MHz. RAM states that Capitol has a device that is patched in to its paging base station that imitates the sound of a tone page transmission. The transmission consists of repeating 4 separate tones in sequence every 90 seconds. These transmissions commenced during the afternoon of Wednesday July 17, 1991, and have continued without interruption. RAM also stated that the device used by Capitol is paging station testing equipment and that it is capable of being removed in less than one minute.

Mr. Shiben places great priority on this and would like an inspection at your earliest convenience. If you can establish malicious interference, he wishes to follow up with revocation of all Capitol's licenses and/or the imposition of a substantial forfeiture.



Carol Fox Foelak

| Federal Communications Commission | |
|-----------------------------------|--------------------------------------|
| Docket No. (14 231) | Exhibit No. (Cap 19) |
| Presented by <u>Capitol</u> | |
| Disposition | Identified <u>FEB 02 1991</u> |
| | Received <u>2/19/91</u> |
| | Rejected <u> </u> |
| Reporter <u>W. W. W. W.</u> | |
| FEB 02 1991 | |

*in response to audio tape from Capital 11/14/91
claiming ~~that~~ transmitting "Huntington"
call sign over them*
HIS TIMESHARING ON 03/15/91 AT 10.783 CHANNEL 7201 TS1

ORIGINAL

FOBFST
M152.48*WV

WNVM468 MID OHIO VALLEY COMMUNICATIONS INC IB EXP 02/12/96
M00152.48000 TX: VIENNA WV N39-20-38 W081-29-48 FB6

M00152.48000 TX: DALLISON WV N39-14-39 W081-16-32 FB6

M00152.48000 TX: SAINT MARYS WV N39-21-57 W081-09-33 FB6

M00152.48000 TX: RAVENSWOOD WV N39-02-07 W081-40-04 FB6

M00152.48000 TX: MOUNT ZION WV N38-51-43 W081-07-33 FB6

WNAV742 WESTVACO CORPORATION IB EXP 07/09/95
M00152.48000 TX: PIEDMONT WV N39-28-12 W079-02-56 FB

WNGQ585 DAVIS, BOB C:LANE, BRUCE A IB EXP 11/26/95
M00152.48000 TX: NEW MARTINSVILLE WV N39-39-21 W080-47-42 FB6

WNSX646 CAPITOL RADIOTELEPHONE COMPANY INC IB EXP 09/12/95
M00152.48000 TX: CHARLESTON WV N38-22-36 W081-42-09 FB6

M00152.48000 TX: CHARLESTON WV N38-22-36 W081-42-09 FB6

M00152.48000 TX: HUNTINGTON WV N38-23-28 W082-29-10 FB6

M00152.48000 TX: HUNTINGTON WV N38-23-28 W082-29-10 FB6

WNSX645 T&T COMMUNICATIONS INC IB EXP 09/12/95
M00152.48000 TX: WESTON WV N39-04-22 W080-34-50 FB6

M00152.48000 TX: DUO WV N38-21-34 W080-38-51 FB6

M00152.48000 TX: BISMARCH WV N39-11-15 W079-13-26 FB6

M00152.48000 TX: RICHWOOD WV N38-14-02 W080-32-27 FB6

000001

Federal Communications Commission

Docket No. 93-231 Equity Cep

Presented by Cep. Fed

Identified 2.2.94

Disp. 2.2.94

Reported _____

Reporter A. Waldner

Date 2.2.94

KNJY712 ASCO SERVICES INC IB EXP 04/18/94
M00152.48000 TX: PARKERSBURG WV N39-13-36 W081-31-56 FB

KNHL928 BOBIER ELECTRONICS INC IB EXP 09/19/93
M00152.48000 TX: PARKERSBURG WV N39-20-56 W081-30-01 FB

KWD242 OHIO VALLEY MEDICAL CENTER IB EXP 12/04/95
M00152.48000 TX: WHEELING WV N40-03-26 W080-42-51 FB

KVR214 WESTON STATE HOSPITAL IB EXP 06/15/92
M00152.48000 TX: WESTON WV N39-02-17 W080-28-19 FB

WNJN621 RAM TECHNOLOGIES INC IB EXP 05/24/95
M00152.48000 TX: SAINT ALBANS WV N38-23-11 W081-50-28 FB6C

M00152.48000 TX: CHARLESTON WV N38-22-32 W081-39-26 FB6C

M00152.48000 TX: PARKERSBURG WV N39-09-52 W081-37-02 FB6C

WNMX434 T & T COMMUNICATIONS INC IB EXP 05/14/95
M00152.48000 TX: BEVERLY WV N38-52-21 W079-55-37 FB6

M00152.48000 TX: MORGANTOWN WV N39-33-59 W079-52-34 FB6

M00152.48000 TX: CLARKSBURG WV N39-17-05 W080-19-47 FB6

M00152.48000 TX: FAIRMONT WV N39-26-40 W079-59-10 FB6

WNQV776 RAM TECHNOLOGIES INC IB EXP 04/23/95
M00152.48000 TX: KOPPERSTON WV N37-47-10 W081-31-08 FB6C

WNPZ514 TWO WAY RADIO INCORPORATED IB EXP 08/07/94
M00152.48000 TX: LAYLAND WV N37-55-39 W080-58-16 FB6

000002

WNJP923 SLAUGHTER, FRED L
M00152.48000 TX: SUTTON

IB EXP 05/02/94
WV N38-40-28 W080-42-20 FB6C

M00152.48000 TX: GASSAWAY

WV N38-40-22 W080-46-58 FB6C

M00152.48000 TX: FRAMETOWN

WV N38-37-48 W080-51-12 FB6C

Done
WNNN470 T & T COMMUNICATIONS
M00152.48000 TX: WHEELING

IB EXP 03/28/94
WV N40-10-24 W080-35-05 FB6C

WNNN469 T & T COMMUNICATIONS INC
M00152.48000 TX: PARKERSBURG

IB EXP 03/28/94
WV N39-14-47 W081-28-19 FB6C

M00152.48000 TX: SUTTON

WV N38-42-48 W080-40-47 FB6C

WNMV298 T&T COMMUNICATIONS INC
M00152.48000 TX: PHILLIPPI

IB EXP 10/19/93
WV N39-07-58 W080-00-19 FB6

TAPE COUNTER
036
067
177
200
292
330
380
WNLM930 COMMUNICATION SERVICE INC
M00152.48000 TX: LESAGE

IB EXP 05/03/93
WV N38-31-22 W082-14-06 FB6C

M00152.48000 TX: CHARLESTON

WV N38-11-17 W081-35-53 FB6C

M00152.48000 TX: SAINT ALBANS

WV N38-24-15 W081-53-46 FB6C

M00152.48000 TX: LAYLAND

WV N37-55-38 W080-58-15 FB6C

M00152.48000 TX: CHARLETSON

WV N38-19-47 W081-39-36 FB6C

WNLF834 CAMDEN CLARK MEMORIAL HOSPITAL
M00152.48000 TX: PARKERSBURG

IB EXP 03/24/93
WV N39-14-41 W081-25-04 FB

M00152.48000 TX: PARKERSBURG

WV N39-16-11 W081-33-36 FB

QUERY COMPLETED

000003

WVKANAWHA*157.74'H'H'H'H'HM157.74

CAL-SGN: WNVZ533 NAME: RAM TECHNOLOGIES INC
RAD-SER: IB

CAL-SGN: WNVZ461 NAME: LAWRENCE, RON
RAD-SER: IB

CAL-SGN: KVF262 NAME: UNION CARBIDE CHEMICALS & PLASTICS COMPA
RAD-SER: IB

QUERY COMPLETED

STCTFR
WVCABELL*M157.74

CAL-SGN: KCH689 NAME: AIRTIME COMMUNICATIONS INC

QUERY COMPLETED

000004



April 10, 1991

Mr. Jim Walker
Federal Communications Commission
1017 Federal Building
31 Hopkins Plaza
Baltimore, MD 21201

Dear Jim:

Thank you for taking the time to talk with me yesterday. I know you are busy. I feel, though, that as long as Capitol is making allegations we must answer them.

I received a copy of the Capitol videotape yesterday and reviewed it with our chief engineer. If you listen to what Mr. Raymond says it sounds very bad. However, we are very familiar with Commonwealth Paging Terminals since we have used them for years. There is a big difference in what the lights on the terminal and the audio portion tell us is happening and what Mr. Raymond says is happening in his narration.

There are several collisions evident and Mr. Raymond knows how to fix that problem -- Connect our terminal with his via a phone line. Also, several times Capitol's paging system actually transmits over our paging system. We think they have a problem in the receiver of their busy monitor. Their busy monitor receive problem is very evident later in the video when you can actually hear the audio of our system fragment and break up on their monitor.

Jim, enclosed is a copy of a declaration from our service manager and one of our technicians concerning Capitol's UHF frequency they are using to link to their 152.480 transmitters. Also, included is a frequency listing on that UHF frequency (461.150) showing the probable cause of their interference problems. This print out was furnished to me by NABER on March 28, 1991. You can see from this print out that Capitol has chosen a very busy channel and we think that is the source of the

DIVISIONS INCLUDING:

• LONG DISTANCE
TELEPHONE SAVERS

• RADIO ENGINEERING
& MAINTENANCE CO.

• RAM-PAGE

• TELEGLOBAL
COMMUNICATIONS

• HUNTINGTON TELEPHONE
ANSWERING SERVICE, INC.

2025 13TH STREET ■ P. O. BOX 1760 ■ ASHLAND, KENTUCKY 41105-1760
1-606-324-1RAM 1-304-343-1RAM 1-304-522-1RAM

000005

Mr. Jim Walker
April 10, 1991
Page 2

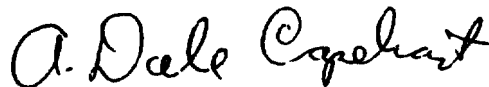
interference. When Mr. Raymond says they are being "knocked off the air" supposedly by us what is really happening is that a UHF repeater customer is knocking down their link receiver which in turn knocks down their 152.480 transmitter and then our busy monitor seeing a clear channel allows our system to transmit. This information on the link frequency was supplied to Mr. Shiben and Ms. Foelak at our meeting on April 4, 1991, in Washinton.

In short, Jim, we feel that either intentionally or through ignorance Mr. Raymond and Capitol paging are attempting to distort the true picture of what is happening in this situation. The video tape is self incriminating for Capitol.

If you have questions of a technical nature please call Forrest Collier at our office and if you wish he can put you in touch with Commonwealth's technical people who I feel will corroborate everything we have said.

Please feel free to call me at any time.

Sincerely,



A. Dale Capehart
Sales Manager

ADC/tlw

Enlclosure

RAM Technologies, Inc.

DIVISIONS INCLUDING:

• LONG DISTANCE
TELEPHONE SAVERS

• RADIO ENGINEERING
& MAINTENANCE CO.

• RAM-PAGE

• TELEGLOBAL
COMMUNICATIONS

• HUNTINGTON TELEPHONE
ANSWERING SERVICE, INC.

2025 13TH STREET ■ P. O. BOX 1760 ■ ASHLAND, KENTUCKY 41105-1760
1-606-324-1RAM 1-304-343-1RAM 1-304-522-1RAM

000000

Declaration of Forrest A. Collier and Luke A. Blatt

I, Forrest A. Collier and I, Luke A. Blatt being of at least 21 years of age and citizens of the United States, do hereby declare under penalty of perjury as follows:

I, Forrest A. Collier, am a graduate of Ashland Vocational Technical School, majoring in electronics and communications. I am FCC licensed PG-4-9969 as General Class License. I am employed with RAM Technologies, Inc. as a Technical Service Manager.

I, Luke A. Blatt, am a graduate of Ashland Vocational Technical School majoring in electronics and communication. I am employed with RAM Technologies, Inc. as a Communication Technician.

While performing our duties for RAM Technologies, Inc. on March 28, 1991 the following was discovered:

We were assigned the task of investigating a possible interference between our PCP System 152.480 and Capitol's PCP 152.480. After investigating the problem on 152.480 it was found that only a few collisions were occurring. Due to both systems trying to access the channel at the exact same time.

At this point we monitored Capitol's link frequency of 461.150 and found 2-way radio traffic to be interfering with their signal in the Huntington, West Virginia area. The interference was very strong and was distorting their signal causing their transmission to be garbled.

This test was performed from our Burlington, Ohio tower site.

We, declare under penalty of perjury, that the foregoing is true and correct to the best of our own personal knowledg.

DATE EXECUTED: March 28 1991 BY: Forrest A. Collier

DATE EXECUTED: March 28 1991 BY: Luke A. Blatt

Sworn and subscribed before me this 28th day of March, 1991.

Barron F. Penrock
NOTARY PUBLIC

Our Commission expires: 3-21-94

MAR-26-1991 12:46 FROM NABER

2 806 018 9200 PAM TECHNOLOGIES

TO 16063299203 P.02

N A B E R

3/27/91
0:51:03

Page:

CO-CHANNEL USER LISTING

frequency - 461.15000 Latitude - 38:16:25 Longitude - 81:31:27 Radius - 75.00 Mil.
Requested By - Coord - BPN07 Control Number -

Part 90.173 of the FCC's rules and regulations states that unless specifically provided for in the rules, frequencies are allocated on a SHARED basis only and will NOT be assigned for the exclusive use of any licensee. This listing contains licensees and approved NABER coordinations and is for informational purposes only. It is based on NABER's data base which is based, in part, on information made available from the FCC. These records may contain errors, omissions or inaccuracies. NABER will not be responsible for any loss or damage you sustain which is caused by omissions, errors or inaccuracies in the FCC's data base or in the NABER data base.

Co-Channel Users

| CONTROL # | UNITS | CLASS | NAME | LATITUDE | LONGITUDE | M | ANT | ELEV | ERP | DTS | CALL | SIGN | TRANS | CITY |
|-----------|-------|-------|------------------------------|----------|------------|---|-----|------|-----|-----|---------|------|----------------|------|
| 50924081 | 1 | FB | TEL STAR ENTERPRISES INC | 37:14:40 | 81:14:27 | | 35 | 2512 | 110 | 73 | KMHL890 | | BLUEFIELD | |
| 91840253 | 1 | FB6C | ELECTRONIC COMMUNICATIONS OF | 37:47:26 | 81:31:19 | | 250 | 3400 | 100 | 33 | WNCE363 | | KOPPERSTON | |
| 72384043 | 1 | FB4 | TRIAX CABLEVISION USA L P | 37:56:27 | 82:23:51 | | 100 | 1400 | 140 | 53 | WNJM850 | | CRUM | |
| 72384043 | 30 | MO | TRIAX CABLEVISION USA L P | 37:56:27 | 82:23:51 | | | | | 53 | WNJM850 | | 75 MIRA STATIO | |
| 81250031 | 1 | FB4 | GAUZE BROTHERS TRUCKING CO I | 37:56:27 | 82:23:51 | | 100 | 1400 | 140 | 53 | WNLZ656 | | CRUM | |
| 81250031 | 15 | MO | GAUZE BROTHERS TRUCKING CO I | 37:56:27 | 82:23:51 | | | | | 53 | WNLZ656 | | 75 MIRA ASSOC | |
| 82310045 | 1 | FB4 | C & H MOBILE HOMES INC | 37:56:27 | 82:23:51 | | 100 | 1400 | 140 | 53 | WNM232 | | CRUM | |
| 91520039 | 1 | FX2 | PEERLESS EAGLE COAL CO | 38:06:55 | 80:35:54 | | 60 | 4128 | 40 | 51 | WNPX986 | | RUPERT | |
| 51134003 | 1 | FB2 | MULTI-POINT COMMUNICATIONS C | 38:16:25 | 81:31:27 O | | 100 | 1480 | 300 | | WMDA400 | | MALDEN | |
| 51134003 | 16 | MO | MULTI-POINT COMMUNICATIONS C | 38:16:25 | 81:31:27 O | | | | | | WMDA400 | | 25 MIRA MALDEN | |
| 91520039 | 1 | FX1 | PEERLESS EAGLE COAL CO | 38:16:54 | 80:52:15 | | 20 | 2580 | 40 | 35 | WNPX986 | | SUMMERSVILLE | |
| 10150107 | 1 | FB2 | CAPITOL PAGING | 38:22:36 | 81:42:09 N | | 200 | 940 | 250 | 12 | | | CHARLESTON | |
| 73510041 | 1 | FB2 | S & E TWO WAY RADIO | 38:54:12 | 82:14:59 | | 35 | 937 | | 59 | KOG572 | | PROSPECT HILL | |
| 23480109 | 1 | FB4 | GALLIA REFRIGERATION COMPANY | 38:54:12 | 82:14:59 | | 35 | 937 | | 59 | KNOX356 | | GALLIPOLIS | |

otal # of Records: 14

000008